

**From:** [Coltrain, Katrina](#)  
**To:** [Jeff Pearl](#); [Turner, Philip](#)  
**Cc:** [Amy.Brittain@deq.ok.gov](#); [Jack Lawmaster](#); [Downham, Todd](#)  
**Subject:** RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow  
**Date:** Tuesday, January 05, 2016 8:50:00 AM

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I do not know Phil's schedule. I propose that we speak this afternoon, and if there are lingering questions that he needs to address, then I will coordinate them with him.

Katrina Higgins-Coltrain  
Remedial Project Manager  
US EPA Region 6  
LA/OK/NM Section (6SF-RL)  
1445 Ross Avenue  
Dallas, Texas 75202  
214-665-8143

-----Original Message-----

From: Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]  
Sent: Monday, January 04, 2016 2:54 PM  
To: Turner, Philip  
Cc: Coltrain, Katrina; [Amy.Brittain@deq.ok.gov](#); [Jack Lawmaster](#); [Downham, Todd](#)  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Mr. Turner -

Would you be available tomorrow at 3:15?

-----Original Message-----

From: Downham, Todd [<mailto:Todd.Downham@deq.ok.gov>]  
Sent: Monday, January 04, 2016 2:45 PM  
To: Jeff Pearl  
Cc: Turner, Philip; Coltrain, Katrina; Brittain, Amy; [Jack Lawmaster](#)  
Subject: Re: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Yes, tomorrow at 3:15 works for me.

Thank you

Todd

Sent from my iPhone

On Jan 4, 2016, at 12:04 PM, Jeff Pearl <[JPEARL@ODOT.ORG](mailto:JPEARL@ODOT.ORG)<<mailto:JPEARL@odot.org>>> wrote:

Todd and Phil - would 3:15pm tomorrow work for you?

From: Coltrain, Katrina [<mailto:coltrain.katrina@epa.gov>]  
Sent: Monday, January 04, 2016 11:31 AM  
To: Jeff Pearl; Downham, Todd; Turner, Philip  
Cc: [Amy.Brittain@deq.ok.gov](#)<<mailto:JPEARL@odot.org>>; 'Jack Lawmaster'  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Good Day, I am back in the office, and I am available for a call tomorrow. I am not available from 10-11am or from 200-300pm.

Katrina Higgins-Coltrain  
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Dallas, Texas 75202  
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From: Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]  
Sent: Wednesday, December 30, 2015 11:44 AM  
To: Downham, Todd; Turner, Philip  
Cc: Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>; 'Jack Lawmaster'; Coltrain, Katrina  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Agreed. We'll try to keep those timeframes open and touch base with everyone sometime Monday to firm up a day and time. Thanks!

From: Downham, Todd [<mailto:Todd.Downham@deq.ok.gov>]  
Sent: Wednesday, December 30, 2015 11:42 AM  
To: Jeff Pearl; Turner, Philip  
Cc: Brittain, Amy; 'Jack Lawmaster'; Coltrain, Katrina  
(coltrain.katrina@epa.gov<<mailto:coltrain.katrina@epa.gov>>)  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Thanks Jeff,  
Next Monday or Tuesday works for me. My preference is to find a time that works with everyone, including Katrina. That way we can all be on the same page.  
I realize everyone is busy, and I appreciate you working with our schedules.

Happy New Year!

Todd Downham  
Environmental Programs Specialist  
Department of Environmental Quality  
Site Remediation Section  
Land Protection Division  
(405) 702-5136  
todd.downham@deq.ok.gov<<mailto:todd.downham@deq.ok.gov>>

From: Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]  
Sent: Wednesday, December 30, 2015 11:26 AM  
To: Downham, Todd; Turner, Philip  
Cc: Brittain, Amy; 'Jack Lawmaster'; Coltrain, Katrina  
(coltrain.katrina@epa.gov<<mailto:coltrain.katrina@epa.gov>>)  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Sure. Would Monday PM or Tuesday AM tentatively work for you and Philip? If so, maybe we can also check with Katrina when she gets back so she can attend, too.

From: Downham, Todd [<mailto:Todd.Downham@deq.ok.gov>]  
Sent: Tuesday, December 29, 2015 3:52 PM  
To: Jeff Pearl; Turner, Philip  
Cc: Brittain, Amy; 'Jack Lawmaster'; Coltrain, Katrina  
(coltrain.katrina@epa.gov<<mailto:coltrain.katrina@epa.gov>>)  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Thanks Jeff. Could we schedule something the week of January 4th?  
This week is not good for me.  
Thank you.

Todd Downham  
Environmental Programs Specialist  
Department of Environmental Quality  
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Land Protection Division  
(405) 702-5136  
todd.downham@deq.ok.gov<<mailto:todd.downham@deq.ok.gov>>

From: Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]  
Sent: Tuesday, December 29, 2015 2:59 PM  
To: Turner, Philip; Downham, Todd  
Cc: Brittain, Amy; 'Jack Lawmaster'  
Subject: FW: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

As per Katrina's request to follow up with you two, are you available for a conference call tomorrow around 10am?  
In discussing with our consultant, a few questions have arisen, to the point I think a call would be more efficient than back and forth emails.

Thanks in advance,

Jeff

From: Coltrain, Katrina [<mailto:coltrain.katrina@epa.gov>]  
Sent: Friday, December 18, 2015 2:36 PM  
To: Jeff Pearl; Todd Downham (todd.downham@deq.ok.gov<<mailto:todd.downham@deq.ok.gov>>)  
Cc: Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>; lwhitehouse@creekcountyonline.com<<mailto:lwhitehouse@creekcountyonline.com>>; frank.chiles@atkinsglobal.com<<mailto:frank.chiles@atkinsglobal.com>>; Turner, Philip  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Jeff, this is my understanding and response to the email attached.

Phil Turner will need to address the use of the screening numbers. These are specific to industrial scenarios only. Material has been placed near residential properties. With the detection limits presented, only a comparison for the industrial worker scenario can be made.

As for the depth profiles, all borrow needs to be characterized. I understand that the depth varies across the area. Given that the exact depth is unknown, I would expect that the field sampler would look at the core recovered prior to collecting the sample in order to limit the possibility of sampling material that is not borrow fill.

Mixing should not be assumed. If the material is deeper than 6 inches, then additional samples at depth will be

needed. The sample plan, using grid aliquots to make one composite is acceptable, but that composite must be of soils that represent the same depth. Please see the attached document for more clarity on this. Likewise, one sample at a depth of 5-6ft cannot be extrapolated to represent all deeper borrow material. The composite concept can be applied for soils at depth.

I will be out of the office for the next two weeks. Please follow-up with Phil and Todd.

Katrina Higgins-Coltrain  
Remedial Project Manager  
US EPA Region 6  
LA/OK/NM Section (6SF-RL)  
1445 Ross Avenue  
Dallas, Texas 75202  
214-665-8143

From: Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]  
Sent: Friday, December 18, 2015 2:09 PM  
To: Coltrain, Katrina; Todd Downham ([todd.downham@deq.ok.gov](mailto:todd.downham@deq.ok.gov)<<mailto:todd.downham@deq.ok.gov>>)  
Cc: Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>; lwhitehouse@creekcountyonline.com<<mailto:lwhitehouse@creekcountyonline.com>>; frank.chiles@atkinsglobal.com<<mailto:frank.chiles@atkinsglobal.com>>  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina -

Thanks for your comments. Please see our responses below in green, and feel free to call if you wish to discuss.  
Thanks,

Jeff

From: Coltrain, Katrina [<mailto:coltrain.katrina@epa.gov>]  
Sent: Friday, December 11, 2015 12:56 PM  
To: Jeff Pearl  
Cc: Todd Downham; Turner, Philip  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Jeff, a few comments for your consideration. There may be other comments from the risk assessor and ODEQ. Thank you for the opportunity to review your plan. Please call if you have any questions related to these comments.

1. The grids look to extend past the areas where the soil was placed. All grids should be limited to the extent of soil placement. Any inclusion of soil that is not borrow soil will alter results and potentially 'dilute' the concentration of the borrow soil which is what you are trying to characterize. The grids have been established according to the extent of material placement as determined by interviews with the construction contractor and inspector in a meeting that occurred after you, Todd and I met on-site. ODOT construction personnel, our environmental consultant and myself met with the construction contractor and inspector to further assess where the material in question may have been placed. Based on a review of the construction timeline and documentation, it was determined that material could have been placed in the areas ultimately outlined in the sampling plan, albeit at greatly varying thicknesses. For example, it was initially reported that the material was predominantly in the bridge approaches at a thickness of maybe a foot or two, and in the slope off the southwest corner of the bridge at a much greater thickness due to filling in the prior work road area. In the later meeting it was determined material could also have been "feathered-out" substantially to the west. Although this would likely be a very thin layer, it still seemed appropriate to assess. Please be assured our goal is to make sure we don't leave any possible suspect areas

unaddressed, not dilute the samples. ACTION: For the reasons described above, we propose no change to the work plan in this matter.

2. The text indicates that the borrow soils range in depths from 2ft to 8ft. Why is the sample plan only collecting 1 sample per grid from the 0-6in depth? This will not provide information on the remaining fill that was placed on the site. Characterization of the fill will require additional samples. The data from 0-6in is not representative of the entire depth range. As discussed above, the estimated thickness of the material varies greatly. However, the greater thickness is reportedly limited to the area where the former work road was filled, off the southwest corner of the bridge. This is the reason for adding a deeper sample from this area (see also comment 5 below). The thickness reportedly ranges from 0 to 2' in the remaining "thinner" areas (possibly approaching zero in some areas that cannot be determined). For these "thinner" areas, the notion was that the material has likely been mixed substantially via excavation, transport by dump truck, dumping, and then grading, to the extent that sampling to depth and vertically compositing for such a small thickness didn't seem necessary in these areas (in other words, the four-point horizontal composite from 0-6" should be representative). Further, since the thickness of the material varies and cannot be known for certain, sampling deeper actually increases the potential for sampling underlying, non-borrow material, which I think should be avoided (similarly due to the concern of inadvertent dilution). ACTION: If EPA/DEQ concurs with the above explanation, we propose adding similar language to the work plan for clarity. Conversely, if you still have questions, we respectfully request guidance on how the approach can be improved.

3. Based on the text, soils near the abutments have been overlain with riprap. Though the text is not clear, it is assumed that the sampled will be pulled from the borrow soil that was buried. Your assumption is correct. Riprap will be removed manually to facilitate the use of a hand auger to bore into the material in question. No riprap or associated material will be sampled. ACTION: We propose adding similar language to the work plan for clarity.

4. For the grids that include the driveways, if the sample is being collected at the corner of each grid, then the driveway that falls in the center of the grid will only be represented by one sample aliquot and two aliquots will represent soil that was not brought over as fill. Efforts should be made to sample the fill that was brought over and placed in the construction area. Agreed. ACTION: We propose adding clarifying language to the work plan indicating sample points in these areas will be intentionally biased away from areas that do not appear to have had received borrow.

5. What is the purpose of the sample being collected at the 5-6ft depth? See response to comment 2 above.

6. What are the detection limits for the contaminants listed in Table 1? Will the detection limit be low enough to provide information that can be used to assess whether the soil poses a potential risk? Please see the attached table for MDLs and RLs prepared by our environmental consultant. Also listed in the table are the EPA Industrial RSLs, which appear to be achieved. ACTION: Please let us know if any additional information is needed.

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From: Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]  
Sent: Wednesday, December 09, 2015 1:13 PM  
To: Coltrain, Katrina; Todd Downham ([todd.downham@deq.ok.gov](mailto:todd.downham@deq.ok.gov)<<mailto:todd.downham@deq.ok.gov>>)  
Cc: Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>; lwhitehouse@creekcountyonline.com<<mailto:lwhitehouse@creekcountyonline.com>>; Chiles, Frank F  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow  
Importance: High

Katrina and Todd -

Attached please find the draft work plan for sampling the material in question at the referenced site. As you are well aware, all parties are anxious to get this work done, so we're hoping to get fieldwork started in a week or so. Please feel free to let us know if you have any questions, comments or concerns so we can keep this project moving.

Once again, we appreciate your patience and cooperation in this matter.

Sincerely,

Jeff

From: Jeff Pearl

Sent: Friday, December 04, 2015 12:26 PM

To: Coltrain, Katrina (coltrain.katrina@epa.gov<<mailto:coltrain.katrina@epa.gov>>); Todd Downham (todd.downham@deq.ok.gov<<mailto:todd.downham@deq.ok.gov>>)

Cc: Dawn Sullivan; Mark Zishka; Mark Scott; James Pruett;

'Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>';

'lwhitehouse@creekcountyonline.com<<mailto:lwhitehouse@creekcountyonline.com>>'; Shannon Sheffert; 'Chiles, Frank F'

Subject: FW: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina and Todd -

I'm told the plan is still being revised and should be ready to submit to the County Monday. I'm hoping to get it to you within a few days thereafter. Thanks, and please feel free to call with questions.

Jeff

From: Jeff Pearl

Sent: Wednesday, November 25, 2015 3:33 PM

To: Coltrain, Katrina; Todd Downham

Cc: Dawn Sullivan; Mark Zishka; Mark Scott; James Pruett;

Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>;

lwhitehouse@creekcountyonline.com<<mailto:lwhitehouse@creekcountyonline.com>>; Shannon Sheffert

Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina and Todd -

Once again I thank you for your patience in this matter, as there are quite a few parties involved and we're trying not to leave anyone out of the process. Figuring out who's responsible for what has been, to say the least, a challenge.

In short, as indicated below, we have task ordered a consultant to prepare a work plan for sampling and should be putting that in front of the County next week. That should be the last stop before submitting to you and Todd. With a little luck, I'm hoping to have it to you be the end of next week.

Thanks again for your continued cooperation, and feel free to call my cell (405-249-2751) anytime if you have questions.

Jeff

From: Shannon Sheffert

Sent: Wednesday, November 25, 2015 3:28 PM

To: Coltrain, Katrina; Jeff Pearl; Todd Downham  
Cc: Dawn Sullivan; Mark Zishka; Mark Scott; James Pruett;  
Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>;  
lwhitehouse@creekcountyonline.com<<mailto:lwhitehouse@creekcountyonline.com>>  
Subject: RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek,  
Creek Co., Bristow

Ms. Coltrain, I suspect that Mr. Pearl is off today and won't be back till next week. On that note, in general we are working with Enviro Clean Cardinal LLC for some sampling investigation in all the suspected borrow placement areas on the bridge site. I am not sure of the time frame but they are working on a task order approval to get started soon. I will ask Jeff to respond when he gets back in to the office.

Thanks

Shannon Sheffert

Local Government Division Engineer

From: Coltrain, Katrina [<mailto:coltrain.katrina@epa.gov>]  
Sent: Wednesday, November 25, 2015 2:57 PM  
To: Jeff Pearl; Todd Downham  
Cc: Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett;  
Amy.Brittain@deq.ok.gov<<mailto:Amy.Brittain@deq.ok.gov>>  
Subject: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek  
Co., Bristow

Jeff, on October 27, 2015, Todd Downham, ODEQ, and I were at the Wilcox Oil Company Superfund. While at the site, Todd and I noticed that soil was being removed from the superfund site by contractors working on the 8th Street Bridge over Sand Creek in Bristow, Oklahoma. We further learned that the soil was being used as fill material along the road and bridge bank. We immediately called and discussed this issue with you over the phone, and then followed that conversation with an onsite meeting the same day.

Please provide us with an update on how the bridge project team plans to move forward.

Thanks

Katrina Higgins-Coltrain  
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